January 22, 2002

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W. TW-A325
Washington, DC 20554

Re: *Ex Parte* Notification and Summary, Revision of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission Systems, ET Docket No. 98-153

Dear Ms. Salas:

On January 17, 2002 the following individuals and the undersigned met with John Cody, Advisor to Chairman Powell: Brian Valania, Town of Painted Post, New York, Rescue Company and Interior Firefighter, CEO of Florian Wireless; Steve Dove, Town of Painted Post, New York, Rescue Company Captain and Interior Firefighter, Florian Engineer and Project Leader; George Hough, firefighter, Research Assistant, Polytechnic University, New York, Center for Fire Safety Engineering; Rich Nowakowski, Coordinator of Special Projects, City of Chicago, Office of Emergency Communications, Research and Development Section; Mark Fobare, CEO of Tiercent, based in New York; Gary Ewers, VP of Sales and Marketing, Class 1, Inc. and Hale Products, Inc., based in Florida; and Anneliese Germain, Siemens Corporate Research.

The firefighters and other emergency personnel discussed the value of ultrawideband technology for firefighting and public safety applications from their perspective as first responders. Emergency personnel described the importance of see-through-wall imaging applications at sufficient power levels for effective use by police and SWAT teams. Industry representatives explained how their companies are developing firefighter tracking and other applications for public safety use using UWB. We explained that these applications would not be possible at power levels below the FCC's proposed rule for Ultra-Wideband transmission systems. We are concerned that final rules for UWB might not allow for use of this technology for firefighting applications such as tracking and positioning, either by 1) significantly limiting its power levels or 2) restricting its use to indoor environments or 3) by requiring operation at higher frequencies.

Participants described how UWB's precise tracking and positioning features, combined with its data transmission capabilities, support a dramatic advance in firefighting technology. Opponents of UWB have urged the FCC to limit UWB's power for operation. This restriction would eliminate the ability to provide through-wall tracking and positioning, which is

essential for tracking firefighters in three dimensions in order to locate them within a multistory structure. Similarly, UWB opponents have asked the FCC to restrict UWB to indoor environments. This would severely hamper use of this technology for public safety, since firefighter applications require outdoor use of UWB by public safety personnel in order to support tactical command of the fire, which is managed outside the building. Finally, some have suggested that UWB be limited to only public safety use. While conceptually we have no objection to this, we know from experience that only with commercial deployment will the price of UWB technology be within reach of public safety agencies.

The group expressed the view that UWB technology can bring a dramatic improvement in the safety of first responders and emergency personnel and strongly urged the Commission to approve UWB to allow for these important uses.

Sincerely,

Kristan Van Hook
Mindbeam, LLC